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November 3, 2017

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 11/13/2017

Re: *De La Cruz v. Trejo Liquors, Inc.*, 16 CV 4382

Dear Judge Broderick:

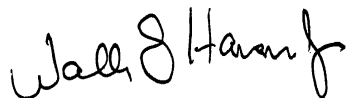
We represent Plaintiffs Paulino De La Cruz and Juventino Ramos in the above-referenced action. We write to respectfully request a 30-day extension of time to serve the Court's November 1, 2017 Order (Docket No. 71) and annexed declaration of Walker G. Harman, Jr., proposed default judgment, pleadings, affidavits of service, and Clerk's Certificate of Default on Defendant Trejo Liquors, Inc. ("Trejo Liquors").

Plaintiffs have made repeated attempts to serve the aforementioned documents without success. On November 2, 2017, and November 3, 2017, Plaintiffs twice attempted to serve the documents on Trejo Liquors at its store location at 948 Amsterdam Avenue, New York, New York 10025, but were unable to do so, as the store was closed "due to a delayed license renewal." After the second failed attempt, Plaintiffs attempted service at Defendant Johanny Trejo's address (353 Fort Washington Avenue, Apartment 1E, New York, New York 10033, which Plaintiffs' counsel found through their own research), but learned that Ms. Trejo does not reside at this address; it now belongs to the pediatrics office of Jose R. Jerez, M.D.

As such, Plaintiffs respectfully request a 30-day extension of time to properly serve Trejo Liquors through the New York Secretary of State by serving an authorized person at the New York Department of State's office at One Commerce Plaza, 99 Washington Avenue, Albany, New York 12231. Notwithstanding this request, Plaintiffs' Counsel has sent these documents and this letter to Trejo Liquors by certified mail, proof of mailing attached hereto.

Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

Enclosures